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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,
Plaintiff,
vs.
ELON MUSK,
Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF JARED
BIRCHALL IN SUPPORT OF
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO
COMPEL**

Complaint Filed: September 17, 2018
Trial Date: December 2, 2019

1 **I, Jared Birchall, declare as follows:**

2 1. I make this declaration of personal, firsthand knowledge, and if called
3 and sworn as a witness, I could and would testify competently thereto.

4 2. I submit this declaration in support of Mr. Musk's opposition to Mr.
5 Unsworth's Motion to Compel.

6 3. Since 2016, I have worked with Defendant, Elon Musk, as the
7 President and manager of Excession LLC. Excession is Mr. Musk's family office.
8 As President of Excession, I help manage Mr. Musk's SpaceX and Tesla holdings,
9 perform work related to Mr. Musk's companies Neuralink and The Boring
10 Company, and assist Mr. Musk in personal matters.

11 4. On or about September 7, 2018, Mr. Musk's legal counsel at Cooley,
12 LLP, hired an investigator to prepare for litigation with Vernon Unsworth.

13 5. On September 11, 2018, the investigator provided via email a copy of a
14 national identity card for Woranan Ratrawiphukkun to Mr. Musk's counsel at
15 Cooley, LLP and to myself.

16 I declare under penalty of perjury under the laws of the United States of
17 America that the foregoing is true and correct and that this document was executed
18 in Los Angeles, California.

19
20 DATED: October 1, 2019

21
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23 By _____

Jared Birchall